

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AEROGLOBAL CAPITAL MANAGEMENT,
LLC., a Delaware Limited Liability Company,

Plaintiff,

C.A. NO. 02-CV-5311

v.

CIRRUS INDUSTRIES, INC., a Delaware
Corporation, CIRRUS HOLDING COMPANY
LIMITED, a Cayman Islands Corporation,
CRESCENT CAPITAL INVESTMENTS,
INC., a Delaware Corporation, FIRST
ISLAMIC INVESTMENT BANK, E.C., a
Bahrain Investment Bank, ALAN L.
KLAPMEIER, DALE E. Klapmeier,
PETER P. McDERMOTT, II, JOHN N.
DYSLIN, SIMA GRIFFITH, MARWAN
ATALLA, WILLIAM J. MIDON AND
WILLIAM C. WOOD,

JURY TRIAL DEMANDED

Defendants.

AFFIDAVIT OF DALE E. Klapmeier

STATE OF MINNESOTA)
)
 ss:
COUNTY OF ST. LOUIS)

Dale E. Klapmeier, being first duly sworn upon oath, states and alleges as follows:

1. I am the Chief Operating Officer and Executive Vice President of Cirrus Industries, Inc. My brother, Alan Klapmeier, and I founded the company in 1984 in Baraboo, Wisconsin. I submit this affidavit based on my personal knowledge.
2. Cirrus' headquarters are in Duluth, Minnesota. I reside near Duluth, Minnesota.
3. I do not own any property in the state of Pennsylvania and conduct no

business there. Cirrus advertises its airplanes in national publications but has made no specific effort to sell airplanes in Pennsylvania.

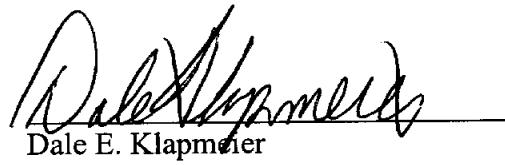
4. In 2001, I, as a representative of Cirrus, took part in some of the discussions between Cirrus and AeroGlobal Capital Management, LLC and its representatives regarding AeroGlobal making an investment in Cirrus. Before the Letter of Intent was ultimately terminated, I personally took part in meetings with AeroGlobal representatives in Newport, Rhode Island, Duluth, Minnesota, and Oshkosh, Wisconsin.

5. After Cirrus terminated the Letter of Intent with AeroGlobal, I met with Christopher Moe and Keith Fitzgerald near the Allentown, Pennsylvania airport to discuss resolution of the lawsuit that AeroGlobal had already filed in Delaware Superior Court. Allentown was chosen as a meeting place because it was equidistant from where the three of us were coming from.

6. To my knowledge, I have never called a Pennsylvania telephone number to reach Craig Millard, Christopher Moe, Ralph Isham, Keith Fitzgerald, or AeroGlobal.

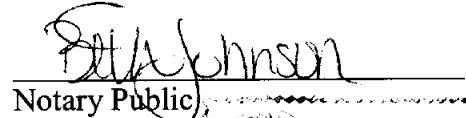
7. With the exception of the Allentown meeting after AeroGlobal sued Cirrus, I have not been in Pennsylvania in connection with Cirrus, AeroGlobal or Crescent Capital.

FURTHER AFFIANT SAITH NOT.



Dale E. Klapmeier

Subscribed and sworn to before me
this 18 day of January, 2002.



Beth A. Johnson
Notary Public

